

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL COREY JENKINS, et al.

PLAINTIFFS

v.

CAUSE NO. 3:23cv374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, et al.

DEFENDANTS

**REPLY TO PLAINTIFFS' [23] RESPONSE TO
[18] SUPPLEMENTAL MOTION FOR JUDGMENT ON THE PLEADINGS**

NOW COMES Defendant, Rankin County, Mississippi, by and through counsel, and in support of its [18] Supplemental Motion for Judgment on the Pleadings, states as follows:

Rankin County's [18] Supplemental Motion for Judgment on the Pleadings seeks dismissal of any and all state law MTCA claims against it related to the hiring, training, and/or supervision of personnel at the Rankin County Sheriff's Department as barred by MISS. CODE ANN. § 11-46-9(1)(d) & (g). In response, Plaintiffs concede that their "complaint makes no such claim for relief under the MTCA." [23] Response, pg. 1. Further, "Plaintiffs readily concede that no such liability can exist under the MTCA for those discretionary functions." *Id.*

Because Rankin County's [18] Supplemental Motion relates solely to state law MTCA claims and not federal § 1983 claims, and because of Plaintiffs' foregoing concessions, the [18] Supplemental Motion should be granted for the reasons stated therein.

RESPECTFULLY SUBMITTED, this 17th day of November, 2023.

RANKIN COUNTY, MISSISSIPPI - DEFENDANT

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